

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA

In RE: Edward A Reott	:	Bankruptcy Case No. 20-22897 GLT
	:	
Debtor(s).	:	Chapter 13
	:	
Edward A. Reott	:	Docket # 48
Movant	:	
vs	:	
No Respondent	:	Judge GLT
	:	

MOTION TO EXTEND TIME

And now comes the Debtor by and through his attorney, Sean Logue and the law firm of Sean Logue, PLLC and, moves the Court to extend the time within which he can file his Amended Chapter 13 plan:

1. The debtor voluntarily filed for relief under Chapter 13 of the Bankruptcy Code in the above referenced case.
2. On December 15, 2020 the debtors 341 Meeting of creditors and Conciliation Conference were held. An Interim Order Confirming plan was entered.
3. On February 2, 2021 an Amended plan was filed. There were objections filed to this Amended plan which we have since been trying to get information pertaining to claims.
4. On 5/28/2021 the court filed an Order setting a hearing to file an Amended plan by June 30, 2021
5. We have been working with the debtor since the Order was entered to prepare an Amended plan resolving all objections and proposing payment of the claims filed. We have prepared a final draft of this Amended plan which must be reviewed by the debtor. The debtor is on a fixed income and the amount proposed must be feasible within his budget. Once this plan has been reviewed, agreed to and signed by the debtor we will be able to file this with the court.
6. Counsel requested a reasonable extension of time to allow for Counsel to meet with The Debtor to review and sign all required documents for filing with the court. For this reason the Debtor requires at minimum an extension of Seven (7) days to file this with the court .

6. Counsel expects to file the Amended plan no later than Wednesday, July 7, 2021.

WHEREFORE, the Debtor respectfully requests that this Honorable Court extend the time for the filing of the Amended plan for seven (7) days until July 7, 2021.

June 30, 2021

/s/ Sean Logue
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